

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 E. 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

MEMO ENDORSED

March 12, 2019

Hon. Katherine Polk Failla
United States District Judge
40 Foley Square
New York, NY 10007

Re: *Alejandro Gonzalez Sanchez, et. al. v. Green Gourmet Deli Corp (d/b/a Gourmet Unlimited), et. al.*; 18-cv-00086

Your Honor:

Our firm represents Plaintiffs in the above-referenced matter. I write to respectfully request a 30-day extension of time to file Plaintiffs' motion for settlement to April 15, 2019. The reason for the request is due to other crucial deadlines, counsel has not yet had a chance to send a draft agreement to Defendants¹. Defense counsel consents to the extension, this is the first request for an extension of the deadline to file the settlement motion. Therefore, for the reasons stated herein, Plaintiffs respectfully request an extension of the deadline to file Plaintiffs' motion for settlement to April 15, 2019.

Respectfully Submitted,

/s/ Gennadiy Naydenskiy
Gennadiy Naydenskiy, Esq.
Michael Faillace & Associates
60 East 42nd Street, Suite 2540
New York, New York 10165
Tel: (212) 317-1200
Fax: (212) 317-1620
Email: gnyaydenskiy@faillacelaw.com
Attorneys for Plaintiffs

¹ Plaintiffs' counsel is expected to send the draft agreement to Defendants within the next couple of days.

Application GRANTED.

Dated: March 12, 2019
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE